

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 16-1005-DLC
	)	
MARK A. JONES	)	<b><u>Filed Under Seal</u></b>
Defendant	)	

**GOVERNMENT'S MOTION  
TO SEAL COMPLAINT**

The United States respectfully moves this Court to order that the Complaint, supporting affidavit, this motion and the Court's order on this motion, and any other paperwork related to this matter be sealed (and that no person shall disclose the issuance of such documents except as necessary for the execution of the warrants and in order to provide notice to the defendant and his counsel of the nature of the charges against him), as the immediate public disclosure of these materials might jeopardize the ongoing investigation of this case, as well as the government's ability to arrest the defendant.

As part of its motion, the government further requests that the Complaint, supporting affidavit, this motion, the Court's order on this motion, and all related paperwork be automatically unsealed upon the arrest of the defendant, which would allow, among other things, the provision of the Complaint and affidavit to the defendant and his counsel.

The United States further moves pursuant to General Order 06-05 that the United States Attorney, through undersigned counsel, be provided copies of all sealed documents which the United States has filed in this matter.

ALLOWED  
D. Schell USMT  
3/11/2016

Dated: March 11, 2016

Respectfully submitted,  
CARMEN M. ORTIZ  
United States Attorney

By: /s/ Eric A. Forni  
Eric A. Forni  
Special Assistant U.S. Attorney